

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION

IN RE:	)	
	)	<b>Case No. 12-2889-TJC</b>
Monica Patricia McGinley	)	
	)	<b>Chapter 13</b>
Debtor(s)	)	
	)	
Plaintiff(s)	)	<b>Adversary No. 12-00745</b>
Monica McGinley	)	
	)	
	)	
Defendant(s)	)	
Central Mortgage Company	)	
PNC Mortgage Bank	)	
	)	

**MOTION FOR AN EXTENSION OF TIME**

Plaintiff Monica Patricia McGinley by and through the undersigned Counsel hereby moves this Court to enter an Order granting her an extension of time in which to cure deficiencies regarding her adversary case and her plaintiff's request to refer this matter to alternative dispute resolution (ADR) until November 29, 2012.

In support of this motion the plaintiff states the following:

1. Plaintiff Monica McGinley filed an adversarial action as a Pro Se litigant on or about October 31, 2012.
2. The Court on November 2, 2012, notified plaintiff that she had the following deficiencies related to her adversary case: (1) the pleading was not captioned correctly; (2) the complaint was not correctly titled, (3) validity and priority of lien and other interest in property and (4) the plaintiff's Notice and/Or Request for Alternative Dispute Resolution/Loss Mitigation was deficient.

3. The Court ordered the plaintiff to cure her deficiencies by November 16, 2012.

4. The undersigned Counsel has just entered her appearance in this matter on behalf of plaintiff. Counsel will be amending the pleading (adversary complaint), adversary cover sheet and a motion for ADR.

5. Plaintiff moves this court to grant her until November 29, 2012, in which to file her amended complaint and to cure any and all deficiencies identified in paragraph two (2) of this motion and/or on the docket pertaining to the adversary claim.

6. Plaintiff's Counsel will require this additional time in which to cure the above deficiencies based on her litigation schedule and the complex issues raised in this bankruptcy proceedings.

7. An extension of time would not harm any debtor at this juncture in the bankruptcy proceedings. However a denial of the motion would harm the plaintiff.

8. The court has already designated the date of November 29, 2012, in which the Plaintiff must file certain pleadings and motions that would impact the debtor's plan.

9. Thus the Court has determined that issues impacting this bankruptcy would not be foreclosed until on or about November 29, 2012, if no pleadings or motions were filed by the debtor.

10. Wherefore having shown good cause, Plaintiff McGinley through Counsel moves this Court to enter an Order granting her an extension of time in which to cure her adversary case deficiencies and ADR deficiency until November 29, 2012.

Respectfully Submitted,

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/s/

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Counsel for Debtor

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of November 2012, a copy of the foregoing Motion For An Extension of Time for Debtor was served upon the Creditors by electronic regular mail postage prepaid and by electronic filing to:

Central Mortgage Company  
801 John Barrow Road  
Little Rock, Arkansas 72205

PNC Mortgage  
3232 Newmark Drive  
Miamisburg, Ohio 45342

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/s/

Jo Ann P. Myles